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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LAS VEGAS DEVELOPMENT GROUP, LLC,
a Nevada limited liability company,

Plaintiff,

vs.

2014-3 IH EQUITY OWNER, LP, a Delaware limited partnership; BANK OF AMERICA, NA, a National Banking Association; MERIDIAN FORECLOSURE SERVICE, a California corporation; THR NEVADA II, LP a Delaware limited partnership; THR PROPERTY BORROWER, LP, a Delaware limited partnership; THR PROPERTY GUARANTOR, LP, a Delaware limited partnership; THR PROPERTY HOLDCO, LP, a Delaware limited partnership; 2014-3 IH PROPERTY HOLDCO, LP, a Delaware limited partnership; 2014-3 IH BORROWER, LP, a Delaware limited partnership; GERMAN AMERICAN CAPITAL CORPORATION, a Maryland corporation; CHRISTIANA TRUST, an unknown business entity; DOE individuals I through XX; and ROE CORPORATIONS I through XX,

Defendants.

Case No.: 2:15-cv-00917-GMN-NJK

**STIPULATION TO EXTEND REPLY
DEADLINE IN SUPPORT OF BANK OF
AMERICA, N.A.'S MOTION FOR
SUMMARY JUDGMENT**

(SECOND REQUEST)

Bank of America, N.A. (**BANA**) and THR Nevada II, LP (**THR2**), 2014-3 IH Borrower, 2014-13 IH Equity Owner, LP, THR Property Borrower, LP, THR Property Guarantor, LP, THR Property Holdco, LP, and 2014-3 IH Property Holdco, LP (the THR and IH entities collectively, **THR entities**) stipulate to extend BANA's deadline to reply to its summary judgment motion by one week. [ECF No. 87].

BANA filed its summary judgment motion on September 12, 2019. [*Id.*]. After several extensions and a settlement conference, the THR entities filed its response to the motion on May 7, 2020. [ECF No. 126]. BANA's reply is presently due on June 11, 2020. [ECF No. 128]. If allowed a one-week extension, the deadline to reply would be June 18, 2020. This is the second request to extend this deadline.

Good cause exists to extend this deadline due to the complex and novel issues surrounding dual NRS 116 and 107 sales, including statute of limitations and alternative claims brought by 107-purchasers against financial institutions. Compounding these issues is the fact both BANA and the THR entities want the same outcome in this litigation: ownership vested in THR2's favor. Despite best efforts, BANA is unable to finalize the summary judgment reply by the present deadline as a result of these complex and novel issues. No party will be prejudiced by a one-week extension.

Dated June 10, 2020.

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/s/ Scott R. Lachman

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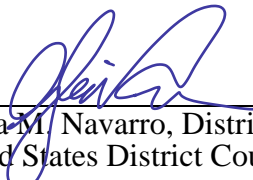
Henderson, Nevada 89074

*Attorneys for 2014-13 IH Equity Owner, LP,
THR Nevada II, LP, THR Property Borrower,
LP, THR Property Guarantor, LP, THR Property
Holdco, LP, and 2014-3 IH Property Holdco, LP*

ORDER

IT IS HEREBY ORDERED that the above stipulation to extend reply deadline in support of Bank of America, N.A.'s motion for summary judgment until June 18, 2020 is GRANTED.

Dated this 9 day of June, 2020.



Gloria M. Navarro, District Judge
United States District Court